

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

VPI HOLDING CO.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 3:12-CV-3875-N
	§	
SUCCESS RESOURCES USA LLC,	§	
	§	
Defendant.	§	

PERMANENT INJUNCTION

By separate order of the same date, the Court granted summary judgment as to liability in favor of Plaintiff VPI Holding Co. (“VPI”) on its claims against Defendant Success Resources USA, LLC (“Resources”) for trademark infringement, false designation of origin, and unfair competition. The Court also ruled in favor of VPI on its request for injunctive relief. Accordingly, the Court enjoins Resources as set out below:

For the purposes of the injunction, the phrase “Disputed Marks” encompasses any mark consisting of the term “success,” when alone or in conjunction with a descriptive term, such as a year, including but not limited to SUCCESS 2012 and SUCCESS 2013. The Court permanently enjoins Resources, together with its officers, directors, agents, employees, parents, subsidiaries, affiliates, or all others acting in active concert with them as follows:

1. Resources may not market, advertise, sell, offer for sale, direct, conduct, or participate in any seminar or symposium under the Disputed Marks, as a title, trademark, trade name, logo, byline, tagline, or domain name;

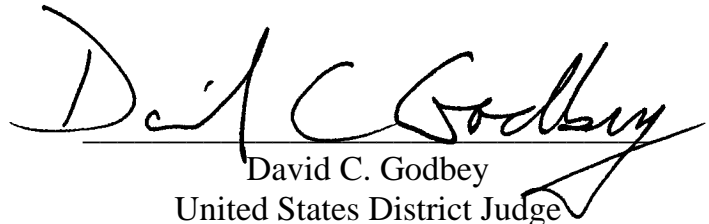
2. Resources may not print, publish, display, distribute, market, advertise, sell, and/or offer for sale any workbook, printed matter and/or electronic file or image which displays the Disputed Marks, as a title, trademark, trade name, logo, byline, tagline or domain name;

3. Resources may not create, send, transmit, display and/or distribute any electronic file and/or image recorded or transmitted for use during a seminar which incorporates the Disputed Marks as a title, trademark, trade name, logo, byline, tagline or domain name;

4. Resources may not make use of any internet domain name, including but not limited to the domain name www.successbusinessseminar.com, to market, advertise, distribute, display, send, transmit, store, sell, print, publish, any seminar, workbook, printed matter, electronic image, electronic file, email and/or electronic communication of any kind which incorporates the Disputed Marks; and

6. Resources may not make use of any social media website or system, including, but not limited to www.facebook.com, www.linkedin.com, and www.twitter.com, to market, advertise, print, publish, display, distribute, send, transmit, store, sell, and/or offer for sale, any seminar, workbook, printed matter, electronic image, electronic file, email and/or electronic communication of any kind which incorporates the Disputed Marks.

Signed December 2, 2014.


David C. Godbey
United States District Judge